

EXHIBIT “A”

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P.002/013

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Corporate Claims

AUG 04 2021

Received

DRUCKMAN & HERNANDEZ, P.C.
LEONARDO R. HERNANDEZ, ESQ.
FILING ATTORNEY NO. 024101992
575 MORRIS AVENUE
ELIZABETH, NEW JERSEY 07208
908-353-5850
ATTORNEYS FOR PLAINTIFF

Plaintiff(s),

JAIRO HIDALGO-RODRIGUEZ,

v.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY

DOCKET NO. ESX-L-5651-21

Defendant(s),

JB HUNT TRANSPORTATION, INC.,
KHALIL PIERRE, John Doe 1-X and
Jane Roe 1-X, said names being
fictitious

CIVIL ACTION

SUMMONS

JB HUNT TRANSPORTATION, INC.

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is

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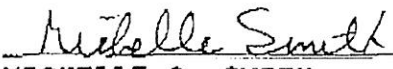
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entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.

DATED: July 20, 2021


MICHELLE S. SMITH
Clerk

ADDRESS FOR SERVICE: 9200 E. 146TH STREET, NOBLESVILLE, IN 46060

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DRUCKMAN & HERNANDEZ, P.C.
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FILING ATTORNEY NO. 024101992
575 MORRIS AVENUE
ELIZABETH, NEW JERSEY 07208
908-353-5850
ATTORNEYS FOR PLAINTIFF

Plaintiff(s) ,

JAIRO HIDALGO-RODRIGUEZ,

v.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY

DOCKET NO.

Defendant(s) ,

CIVIL ACTION

JB HUNT TRANSPORTATION, INC.,
KHALIL PIERRE, John Doe 1-X and
Jane Roe 1-X, said names being
fictitious

COMPLAINT & JURY DEMAND

Plaintiff, Jairo Hidalgo-Rodriguez, by way of Complaint,
says:

FIRST COUNT

1. On or about the 12TH day of January, 2021, plaintiff, Jairo Hidalgo-Rodriguez was the operator of a vehicle traveling on the George Washington Bridge in New Jersey, when same was involved in a collision with a vehicle owned by defendant, JB Hunt Transportation, Inc., and being negligently operated, with his consent and permission, by defendant, Khalil Pierre, his agent, servant or employee.

2. As a direct and proximate result of the combined negligence of the defendants aforesaid, plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering,

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shock, loss of wages and other special damages.

WHEREFORE, plaintiff demands judgment jointly, severally or in the alternative against all defendants on this count for damages, costs of suit, interest and attorneys' fees.

SECOND COUNT

1. Plaintiff repeats the allegations contained in the previous counts of this Complaint and makes them a part hereof.

2. The defendants, John Doe I-X and Jane Roe I-X, are fictitious names intended to identify any and all parties, including individuals, corporations and/or other entities whose identities are presently unknown to the plaintiff, who together with the named defendants were responsible for the ownership, operation, control, lease and maintenance of the vehicles involved in the collision referred to herein or who in anyway caused or contributed to plaintiff's injuries.

3. As a direct and proximate result of the negligence of the defendants aforesaid, plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

WHEREFORE, plaintiff demands judgment jointly, severally or in the alternative against all defendants on this count for damages, interest and costs.

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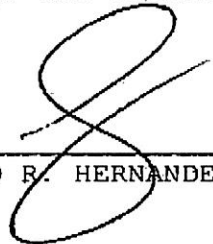
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DRUCKMAN & HERNANDEZ
Attorneys for Plaintiff

DATED: July 20, 2021

BY: 
LEONARDO R. HERNANDEZ, ESQ.

JURY DEMAND

Plaintiff hereby demands a trial by Jury on all counts.

DRUCKMAN & HERNANDEZ
Attorneys for Plaintiff

DATED: July 20, 2021


BY: 
LEONARDO R. HERNANDEZ, ESQ.

DESIGNATION OF TRIAL COUNSEL

Plaintiffs hereby designate Martin P. Convery, Esq. as
trial counsel in the above-captioned matter.

DRUCKMAN & HERNANDEZ
Attorneys for Plaintiff

DATED: July 20, 2021

BY: 
LEONARDO R. HERNANDEZ, ESQ.

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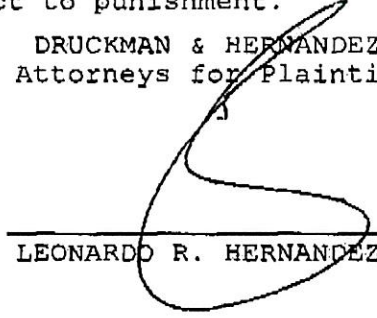
ATTORNEY CERTIFICATION

Pursuant to Rule 4:5-1 the undersigned hereby certifies that at the time of the filing of this complaint, the matter in controversy is not the subject of any other action pending in any court and/or arbitration proceeding.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

DRUCKMAN & HERNANDEZ
Attorneys for Plaintiff

DATED: July 20, 2021

BY: 
LEONARDO R. HERNANDEZ, ESQ.

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Jul 16 21, 03:22p Spinecare Chiropractic 9083553298 p.2
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CERTIFICATION OF PHYSICIAN

Patients Name: Jairo Hidalgo-Rodriguez
Date of Accident: 1/12/21

Dr. Rick Inacio, DC

I, _____, of full age, duly sworn according to law,
hereby certifies as follows:

1. I am a licensed medical physician specializing in Chiropractic
I have been so licensed in the State of New Jersey for the last 23
years.

2. I am a treating physician for the above named and I have
personally treated them as a result of injuries sustained in the motor
vehicle accident on the above date.

3. I hereby certify that this patient has sustained, within a
reasonable degree of medical probability

Lumbar Spine

- Grade 1 spondylolisthesis at L4-S1 which is probably the result of L5
spondylolysis which can be evaluated further with CT or oblique x-rays.
Hypertrophy of the left facet.

- Disc bulging impressing on the ventral thecal sac at L4-5 with
subligamentous L3-4 disc bulging as a direct result of the motor vehicle
accident. This diagnosis is based upon my objective examinations and
diagnostic test results including MRI test results and objective clinical
evidence of injury as manifested by muscle spasm and limitation of range of
motion, which tests are not experimental and not dependent entirely upon
the subjective response of the patient.

4. It is my professional opinion that, within a reasonable degree of
medical probability, that the aforementioned injuries have resulted in a
permanent injury that has not healed to function normally and will not heal
to function normally with further medical treatment.

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5. I hereby certify the above information is true and accurate to the best of my knowledge and I understand that I am subject to penalty of perjury should any of the above statements be wilfully false.

Dated: 7-19-21

[Signature]

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Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-005651-21

Case Caption: HIDALGO-RODRIGUEZ JAIRO VS JB HUNT TRANSPORTATI

Case Initiation Date: 07/20/2021

Attorney Name: LEONARDO RENE HERNANDEZ

Firm Name: DRUCKMAN & HERNANDEZ, PC

Address: 575 MORRIS AVENUE

ELIZABETH NJ 07208

Phone: 9083535850

Name of Party: PLAINTIFF : HIDALGO-RODRIGUEZ, JAIRO

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: JAIRO HIDALGO-RODRIGUEZ? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an Interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

07/20/2021

Dated

/s/ LEONARDO RENE HERNANDEZ

Signed

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FedEx

Express

CLAMS

FedEx <small>Express</small> NEW Package <i>US Airbill</i> FedEx Tracking Number 8086 5681 1571		Form ID No. 0200				
1 From Date _____ Sender's Name _____ Phone _____ Company JB Hunt Address 9200 E. 14th St. City Norfolk State IN ZIP 46060						
2 Your Internal Billing Reference To Recipient's Name Julie Allred Phone _____ Company JB Hunt Address 611 TB Hunt Corporate Dr. City Lowell State AR ZIP 72745						
3 To Recipient's Name Company JB Hunt Address 611 TB Hunt Corporate Dr. City Lowell State AR ZIP 72745						
4 Express Package Service NOTE: Service order has changed. Please select carefully. <table border="1"> <tr> <th>Next Business Day</th> <th>2 or 3 Business Days</th> </tr> <tr> <td> <input type="checkbox"/> FedEx First Overnight <input checked="" type="checkbox"/> FedEx Priority Overnight <input type="checkbox"/> FedEx Standard Overnight </td> <td> <input type="checkbox"/> FedEx 2Day A.M. <input type="checkbox"/> FedEx 2Day <input type="checkbox"/> FedEx Express Saver </td> </tr> </table>			Next Business Day	2 or 3 Business Days	<input type="checkbox"/> FedEx First Overnight <input checked="" type="checkbox"/> FedEx Priority Overnight <input type="checkbox"/> FedEx Standard Overnight	<input type="checkbox"/> FedEx 2Day A.M. <input type="checkbox"/> FedEx 2Day <input type="checkbox"/> FedEx Express Saver
Next Business Day	2 or 3 Business Days					
<input type="checkbox"/> FedEx First Overnight <input checked="" type="checkbox"/> FedEx Priority Overnight <input type="checkbox"/> FedEx Standard Overnight	<input type="checkbox"/> FedEx 2Day A.M. <input type="checkbox"/> FedEx 2Day <input type="checkbox"/> FedEx Express Saver					
5 Packaging <input type="checkbox"/> FedEx Envelope* <input checked="" type="checkbox"/> FedEx Pak* <input type="checkbox"/> FedEx Box <input type="checkbox"/> FedEx Tube						
6 Special Handling and Delivery Signature Options <input type="checkbox"/> SATURDAY Delivery <input type="checkbox"/> No Signature Required <input type="checkbox"/> Direct Signature <input type="checkbox"/> Indirect Signature <input type="checkbox"/> Does this shipment contain dangerous goods? <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Dry Ice <input type="checkbox"/> Cargo Aircraft C						
7 Payment Bill to: Sender <input type="checkbox"/> Recipient <input type="checkbox"/> Third Party <input type="checkbox"/> Credit Card <input type="checkbox"/> Total Packages _____ Total Weight _____ Your liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.						

